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July 6, 2022

The Honorable Hector Gonzalez
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Chung v. Illuminate Education, Inc.*, 1:22-cv-3110

Dear Judge Gonzalez:

I represent Defendant Illuminate Education, Inc. in this matter. We submit this letter-motion in accordance with the Court's Individual Practices and Local Rules 5.2 and 7.1 to respectfully request an adjournment of the initial status conference and the accompanying submissions until after the Court resolves Defendant's forthcoming motion to dismiss. Plaintiff consents to this request.

This action was filed on May 26, 2022. ECF No. 1. On July 1, 2022, Plaintiff filed a waiver of service setting Defendant's answer or responsive pleading due on August 1, 2022. Pursuant to this Court's Individual Practices, Defendant intends to file a pre-motion letter brief laying out the grounds for its motion to dismiss on or before that deadline.

The current date for the initial status conference is July 11, 2022, at 12:00 PM. In the interest of focusing the parties' efforts on the upcoming motion to dismiss, we request an adjournment of the initial status conference until September 7, 2022, with the relevant submissions filed no later than August 31, 2022.

There have been no previous requests for adjournments of the initial conference and extensions of time to file the accompanying submissions. No previous request was granted or denied, and this request is submitted at least three business days prior to the scheduled initial conference.

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Respectfully,

/s/ Alexia R. Brancato

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